UNITED STATES OF AMERICA SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA, Plaintiff	§ §	
	§	
V.	§	CAUSE NO. 4:10-cv-01237
	§	
\$19,800.00 in U.S. CURRENCY,	§	
Defendant	§	

VERIFIED CLAIM UNDER RULE G(5) OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS

TO THE HONORABLE JUDGE OF THIS COURT:

Ravindra Bharamaraddi (Claimant), by and through undersigned counsel, files a Claim for \$19,800.00 in United States Currency and would show this Court as follows:

- 1. Rule G(5) of the Supplemental Rules for Admiralty and Maritime Claims, Forfeiture Actions in Rem, provides in relevant part:
 - (i) A person who asserts an interest in the defendant property may contest the forfeiture by filing a claim in the court where the action is pending.

The claim must:

- (A) identify the specific property claimed;
- (B) identify the claimant and state the claimant's interest in the property;
- (C) be signed by the claimant under penalty of perjury; and
- (D) be served on the government attorney designated under Rule G(4)(a)(ii)(C) or (b)(ii)(D).
- 2. Claimant identifies the \$19,800.00 in United States (U.S.) Currency as his personal property. This is the same U.S. Currency that was seized from Claimant's person on March 31, 2010, by agents of the United States Customs and Border Protection agency, at Bush Intercontinental Airport, Houston, Texas. This is the same United States Currency that is identified in the Government's Notice and Complaint dated April 16, 2010.

- 3. Claimant filed an Original Answer to the Complaint on May 5, 2010, and has standing to assert a Claim for the \$19,800.00 in U.S. Currency. *United States v.* \$125,938.62, 370 F.3d 1325, 1329 (11th Cir. 2004).
- 4. Claimant hereby makes Claim to the \$19,800.00 in U.S. Currency pursuant to Rule G(5).
- 5. This Claim is timely filed and not less than thirty-five (35) days since the date that the Notice and Complaint was filed.
- 6. Claimant resides at 19707 Woodberry Manor Drive, Spring, Texas 77379. Claimant retained the law firm of Hilder & Associates, P.C. for this matter, and Claimant's attorneys may be reached at the address provided below.

Claimant's attorneys sign this Claim on behalf of Claimant. Claimant provides a Verification attached to this Claim as Exhibit "1".

Respectfully submitted,

HILDER & ASSOCIATES, P.C.

/s/ Philip H. Hilder
Philip H. Hilder
Tex. Bar No. 09620050
Scott L. Mullins
Tex. Bar. No. 24060308
819 Lovett Blvd.
Houston, Texas 77006-3905
(713) 655-9111
(713) 655-9112 (fax)

ATTORNEYS FOR CLAIMANT RAVINDRA BHARAMARADDI

CERTIFICATE OF SERVICE

I certify that this Claim	was served or	n Albert	Ratliff,	Assistant	United States	Attorney, b	Э
iling on May 6, 2010.						•	Ť

/s/ Scott L. Mullins
Scott L. Mullins

VERIFICATION

STATE OF TEXAS §
COUNTY OF HARRIS §

The undersigned states under oath that:

"My name is Ravindra Bharamaraddi. I am over the age of eighteen (18) and I am competent to make the following verification:

I am the Claimant in the foregoing Claim. I have read the attached VERIFIED CLAIM UNDER RULE G(5) OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS, and that the facts stated in it are within my personal knowledge and that they are true and correct.

If called as a witness, I would testify in a court of law. I hereby swear, affirm and state that the foregoing is true and correct under penalty of perjury pursuant to Title 18 U.S.C. §1746."

Ravindra Bharamaraddi

SWORN TO and SUBSCRIBED before me by Ravindra Bharamaraddi on this, the 6th day of May 2010.

Notary Public in and for the

State of Texas

M Jane Faber My Commission Expires 11/23/2012

